



U.S. Department of Justice

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Eastern District of New York*

JN/DKK/LB/CJN
F. #2017R05903

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 4, 2021

By Email and ECF

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Re: United States v. Huawei Technologies Co., Ltd., et al.
Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019. See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendants.

I. The Government's Discovery

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
Documents regarding <u>Motorola, Inc. v. Lemko Corp. et al.</u> , 1:08-cv-5427 (N.D. Ill.); <u>Huawei Technologies Co., Ltd. v. Motorola, Inc. et al.</u> , No. 11-cv-497 (N.D. Ill.); and related matters	Sensitive Discovery Material	DOJ_HUAWEI_A_0009713543 – DOJ_HUAWEI_A_0010186308
Documents regarding <u>Motorola, Inc. v. Lemko Corp. et al.</u> , 1:08-cv-5427 (N.D. Ill.); <u>Huawei Technologies Co., Ltd. v. Motorola, Inc. et al.</u> , No. 11-cv-497 (N.D. Ill.); and related matters	Discovery Material	DOJ_HUAWEI_A_0010186309 – DOJ_HUAWEI_A_0010489091

Very truly yours,

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cc: Clerk of the Court (AMD) (by ECF) (without Enclosures)